Our Case Number: ACP-323977-25

An Coimisiún Pleanála

Eastern Midlands, Connacht-Ulster, & Southern
Regional Waste Management Planning Offices
Dublin City Council, Environment & Transportation Department
I Block B, Floor 2, Blackhall Walk
Queen Street
Dublin 7
D07 ENC4

Date: 24 February 2026

Re: The proposed expansion of the existing landfill facility at the existing Knockharley Landfill in the townlands of Knockharley, Flemingstown and Tuiterath Navan, Co. Meath

Dear Sir / Madam,

An Coimisiún Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

pp Ó Reilly

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA09

REGIONAL WASTE MANAGEMENT PLANNING OFFICES

11th February 2026

AN COIMISIÚN PLEANÁLA
LDG- 086752-26
ACP- 323977-25 (PA)
11 FEB 2026
Fee: € ______ Type: ______
Time: 11:58 By: Hand

An Coimisiún Pleanála,

64 Marlborough Street,

Dublin 1.

RE: Case reference 321572-25

Expansion of Knockharley Landfill

Dear Sir/Madam,

The Eastern Midlands, Connacht-Ulster and Southern Regional Waste Management Planning Offices (RWMPOs) wish to make a joint submission to An Coimisiún Pleanála regarding the above referenced application.

Proposed Development within the Timeline of the Natonal Waste Management Plan for a Circular Economy 2024 - 2030

This submission makes reference to the National Waste Management Plan for a Circular Economy 2024 - 2030[1] (hereafter NWMP), which was published on 1st March 2024.

The proposed development at Knockharley Landfill relates to extending the landfill footprint to facilitate waste acceptance and treatment activities beyond the existing permission. The applicant is proposing to extend the landfill westwards to add additional void capacity of 4.12 million m^3 for landfilling, over a lateral extent of 17.68 ha. The applicant estimates that this additional void space would be filled by 2043, with recovery and restoration operations carrying on until 2046. The nature of the waste activities already permitted will remain the same and the existing permitted annual waste acceptance limit of 440,000 tonnes per annum would be maintained.

The applicant estimates that the existing permitted void space will be filled during 2028 (ref Table 2.13 of the EIAR). The timing for the filling of the proposed extension would dovetail with that and consequently would begin in 2028 (ref Table 2.13 of the EIAR).

[1] National Waste Management Plan for a Circular Economy 2024-2030 - My Waste

The RWMPOs monitor the waste treatment capacity, both within Ireland and through export options, for key waste streams including residual Municipal Solid Waste (MSW) and residual Construction & Demolition (C&D) wastes (i.e. brownfield / non-hazardous soil & stone and the residual fines fraction from the processing of mixed skips), both of which have presented and continue to present significant challenges with respect to available treatment options.

With respect to residual MSW, the treatment options within the state are disposal at landfill and thermal treatment. Shortfalls in this treatment capacity have meant that Ireland is persistently relying on export options for these wastes (194,262 tonnes in 2025), which carries much risk. Refer to the RWMPO Treatment Capacity Report attached.

With respect to residual C&D waste, shortfalls in this treatment capacity have meant that Ireland also relies on export options for some of these wastes (162,710 tonnes in 2025). Refer to the RWMPO Treatment Capacity Report attached.

The current trend for waste generation is growth. Both MSW and residual C&D waste quantities are projected to continue to increase in the coming years, even with allowances made for expected interventions (refer to Chapter 6 of Volume I of the NWMP as well as Chapter 1 of Volume III of the NWMP).

Ireland needs to reduce its reliance on export which is high risk in terms of security of supply and is becoming increasingly challenging. This practice is also contrary to the Proximity Principle resulting in a significantly higher carbon footprint than if the wastes were managed domestically. This is articulated in the NWMP.

As of February 2026, there is only one other non-hazardous waste landfill in the state (Drehid) with Ballynagran Landfill having entered its closure phase following expiration of planning. In 2028 when the current permitted void space at Knockharley is expected to reach capacity, the only landfill operating at that stage in the state would be the privately operated Drehid.

Under the NWMP, the existing Knockharley facility and its proposed development is considered to be 'Nationally Important Infrastructure' (refer to Chapter 5.9 in Volume 1, Core Policy CP12 in Volume II and Chapter 3.2 in Volume III of the NWMP).

It follows that the proposed development with the increased void capacity applied for, will need to continue to operate for a significant period beyond 2028 to ensure business continuity in the waste sector for particular municipal & construction waste streams.

The RWMPOs recommend that some of the conditions attached to the existing permission are repeated with respect to the continued acceptance and treatment of waste as part of the proposed development.

These are:

- to limit the acceptance of residual MSW for disposal to 188,000 TPA. This restriction would not apply in instances requiring the acceptance of material as a result of the activation of contingency capacity provisions.
- to maintain the obligation on the applicant to set aside void space for 44,000 tonnes per annum as contingency capacity.

With respect to infrastructure planning, the NWMP contains a number of policies that are relevant to the proposed development. These are set out in the attached schedule for reference. The proposed development is aligned with each of these policies.

The RWMPOs are available for further consultation and clarification if required.

Yours faithfully

pp pp

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Co-ordinator
Eastern-Midlands
RWMPO

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RWMPO

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SCHEDULE OF NWMP POLICY REFERENCES

CORE POLICY 12

Nationally and Regionally Important Infrastructure

The Plan recognises and supports the need for nationally and regionally important waste infrastructure, including infrastructure of the type, scale and proximity essential to maintain waste services and infrastructure that contributes to the ambition and policies of the Plan.

Core Policy 12 of the NWMP

TP11.2

Enhance national self-sufficiency with the development of sustainable waste management infrastructure where feasible and viable.

Targeted Policy TP11.2, Focus Area 11 Infrastructure (Regulatory)

TP12.4

Encourage the development of circular activities which stimulate and support viable secondary material markets and secondary product markets in the construction, industrial and bioeconomy sectors.

Targeted Policy TP12.4, Focus Area 12 Reuse / Repair Infrastructure

TP14.1

Support the development of pre-treatment capacity for recovery where technically, economically and environmentally practicable in line with the proximity principle.

Targeted Policy TP14.1, Focus Area 14 Recovery Infrastructure

TP14.4

Support the provision of treatment capacity for non-hazardous construction and demolition waste streams (in particular soils, fines, rubble and concrete).

Targeted Policy TP14.4, Focus Area 14 Recovery Infrastructure

TP14.5

Support the provision of national capacity for bottom ash from existing thermal treatment facilities, pending the provision of alternative uses which optimise the circularity of this material.

Targeted Policy TP14.5, Focus Area 14 Recovery Infrastructure

TP15.1

Additional disposal capacity for non-hazardous waste is only supported in the context of compliance with the EU target of disposal to landfill of not more than 10% of MSW by 2035.

Targeted Policy TP15.1, Focus Area 15 Disposal Infrastructure

TP15.2

Ensure the provision of appropriate waste contingency capacity in response to market disruption/interruption and/or events which pose a risk to the environment and/or health of humans and livestock.

Targeted Policy TP15.2, Focus Area 15 Disposal Infrastructure

TP16.2

Maintain annual capacity for the treatment of asbestos waste to ensure the waste stream is managed and monitor the requirement for additional capacity.

Targeted Policy TP16.2, Focus Area 16 Hazardous Waste Infrastructure

ENDS

REGIONAL WASTE MANAGEMENT PLANNING OFFICES

Residual Waste Treatment Capacity

Q4 2025 & PROJECTIONS 2026 REPORT

mywaste

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1. Headlines

Headline Issues

Thermal Treatment of rMSW (SRF) at Cement Kilns reached a new high in 2025 representing 22% of rMSW treated and exceeding CMI projections for 2025.

Continued investment in SRF production by the waste industry has enabled CMI to increase waste treatment and exceed projections.

The increase in waste (SRF) treatment by CMI in 2025 has contributed to mitigating the waste treatment capacity deficit in the period.

The export of rMSW continued to contract in 2025 due to a reduction in the availability of suitable material which may be attributable to the increased collection and treatment of organic waste and other factors.

A combination of marginal growth in rMSW, together with contingency activation, 11th hour additional export capacity, and intensive coordination and engagement contributed to a successful outcome to the year.

2026 presents continued and new challenges which will not be as easily surmounted as those encountered in 2025.

Increased systematic engagement and coordination between key stakeholders, and within key stakeholder groups, will be required in 2026 to mitigate the impact of reductions in rMSW treatment capacity due to changing authorisations and increased thermal treatment outages.

2. Background

The Regional Waste Management Planning Offices (RWMPO), published the "National Waste Management Plan for a Circular Economy 2024-2030" on the 1st March 2024.

Key Deliverable 47 of the plan states that the Local Government Sector will produce a quarterly capacity summary including rMSW & C&D Waste. The Plan supports the continued role of the RWMPO in tracking, reporting and projecting treatment capacities.

Waste data is collected in association with the EPA, the Irish Waste Management Association and the thermal waste recovery and cement industries.

The National Waste Management Plan for a Circular Economy sets the ambition of 0% Total Waste Growth per person per annum over the lifetime of the plan. The ambition speaks to the challenge of waste generation but recognises the vulnerabilities associated with the lack of appropriate waste treatment infrastructure.

2025 continued to be a very challenging despite the increased combustion of SRF at cement plants. Exports continued to contract with high demand for landfill outlets in particular for treatment of fines.

The RWMPO Coordinators, LGMA National Waste Programme Co-ordinator and the EPA have worked with industry to help to manage residual waste in 2025.

3. Residual MSW (rMSW)

The quarterly trends for rMSW managed are shown in the Figure 1 below and 417,029 tonnes of rMSW was managed in Q4 2025 this was the lowest quantity processed per quarter in 2025 but similar to the trends in 2024. Residual waste treatment is achieved through waste recovery and disposal activities.

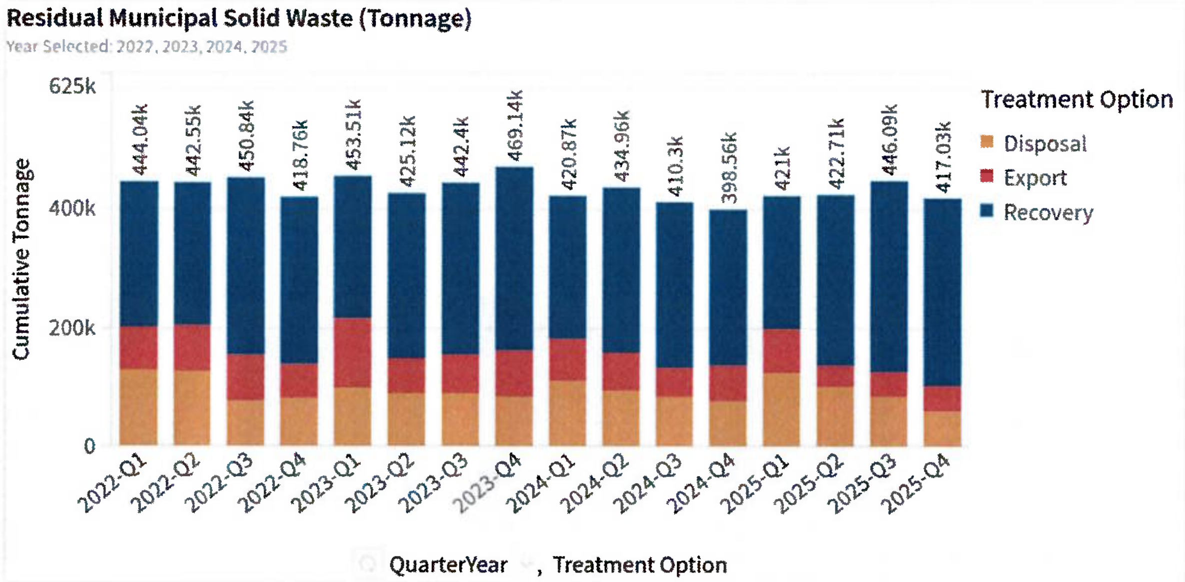

Figure 1: Residual Municipal Solid Waste (rMSW) Trends: 2022, 2023, 2024 & 2025.

2.1 Waste Recovery

The recovery of rMSW in Ireland is achieved principally through direct thermal treatment and co-processing in the cement manufacturing processes. Residual MSW is also recovered through the pre-treatment of waste to yield organic material which following bio-stabilisation may be used at licenced engineered landfills for daily cover and other landscaping activities. Following bio-drying recyclate is also removed from rMSW stream. The rMSW waste generation data will need to be further updated following further research and review in 2026 to account for the impact of pre-treatment.

2.1.1 Thermal Recovery

The thermal recovery sector processed 314,950 tonnes of rMSW in Q4 2025 which is similar to Q3 2025 and a total of 1,149MT was processed in 2025 that is 74,000 tonnes greater than the quantity processed in total in 2024. Indaver WTE surpassed its target, Dublin WTE processing was 11,000 tonnes below projected target for 2025. Cement kilns processed over 100,000 tonnes again in Q4 and 377, 065 tonnes in total in 2025. The cement kilns also surpassed their 2025 projections. Thermal recovery plants imported 11,188 tonnes of SRF/RDF from Northern Ireland in Q4 2025 and almost 36,000 tonne in total this year.

Figure 2 below shows the thermal processing per quarter for the the last five years and indicates the trends which are often related to maintenance periods. Figure 3 below indicates the total quantity thermally recovery per annum for the last five years and this indicates that 2025 was the highest quantity of thermal treatment over the past 5 years.

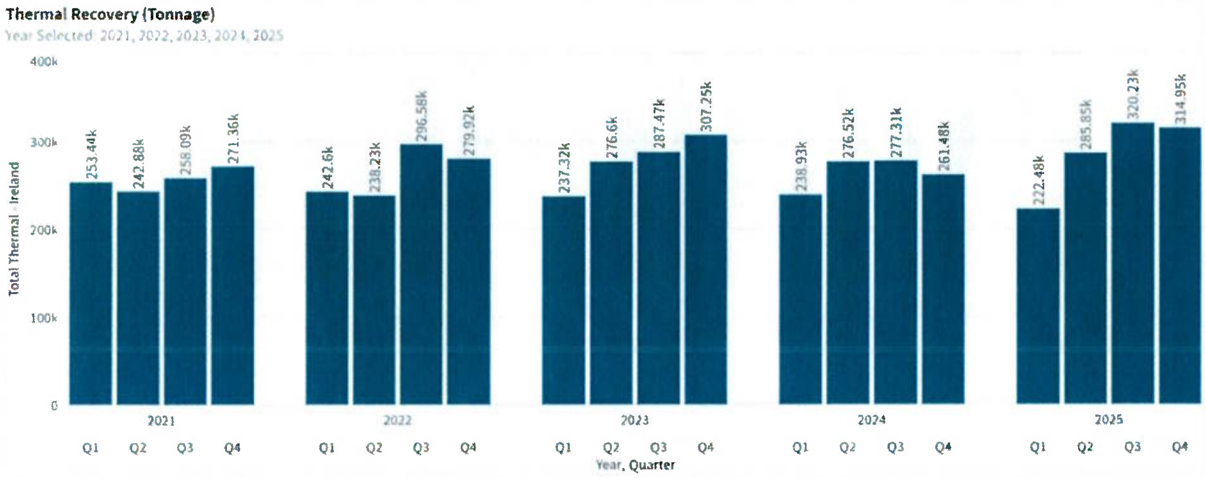

Figure 2: Thermal Recovery of rMSW: Q1,Q2 & Q3 2020, 2021, 2022, 2023, 2024 & 2025.

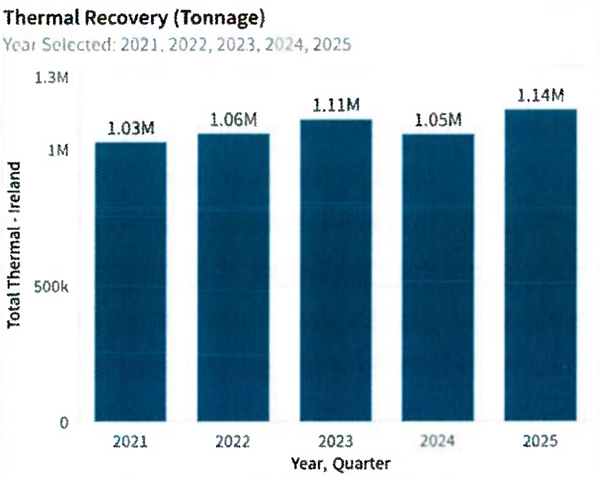

Figure 3: Thermal Recovery of rMSW: Annual Quantity 2021-2024.

2.1.2 Other Recovery Activities

Recovery of waste at landfill sites includes the use of material for specified engineering works and daily cover (includes MSW material such as bio-stabilised fines as well as other fines). Recovery at landfills reached a new high of 736,672 tonnes recovery in 2025. The total recovery for 2025 is over 100,000 tonnes greater than 2024.

Total thermal recovery capacity for 2025 was projected at 1,168Mt provided by Dublin WTE, Indaver (Duleek) and the Cement kilns for ROI Waste. This was reduced in Q2 to 1.130MT and 1.149MT was recovered thermally above projected target for 2025.

Table 1: Landfill Disposal and Recovery Q4 2025

Landfill Disposal Breakdown

Quarter Selected: Q4 || Year Selected: 2025

Facility Information	Quarter	Void Space Used	Recovery
Ballaghveny Landfill	Q4	4,727	15,761
Ballyngran Landfill	Q4	23,279	9,236
Drehid Landfill	Q4	13,820	100,520
Knockharley Landfill	Q4	18,448	57,284
Totals		**60,274**	**182,801**

2.2 Waste Disposal

In Q4 2025, the disposal of residual municipal solid waste (rMSW) in Ireland continued to rely primarily on landfilling. During this period, three privately operated landfills were commercially active across the country. In addition to the private facilities, Ballaghveny Landfill, operated by Tipperary County Council, also contributed to waste management efforts by accepting 4727 tonnes of fines for disposal and 38,823 tonnes of remediated and non-haz soil . C&D wastes make up the highest percentage of materials recovered at landfill . Drehid Landfill intake was much reduced in Q4 2025 as they await a final licencing decision. Ballynagran Landfill had reached capacity with many of its customers by the end of November 2025. Table 1 above indicates the disposal and recovery in Q4 whilst Table 2 below indicates disposal and recovery for 2025 indicating the highest recovery rate recorded.

Table 2: Landfill Disposal and Recovery Breakdown (Q1, Q2, Q3 & Q4 2025)

Landfill Disposal Breakdown
Year Selected: 2025

Facility Information	Quarter	Void Space Used	Recovery
Ballaghveny Landfill	Q1	0	4,756
Ballyngran Landfill	Q1	43,846	18,490
Drehid Landfill	Q1	41,915	52,464
Knockharley Landfill	Q1	38,396	97,479
Ballaghveny Landfill	Q2	0	6,829
Ballyngran Landfill	Q2	40,210	20,793
Drehid Landfill	Q2	29,056	56,147
Knockharley Landfill	Q2	31,370	94,874
Ballaghveny Landfill	Q3	0	11,742
Ballyngran Landfill	Q3	40,842	9,789
Drehid Landfill	Q3	21,547	94,423
Knockharley Landfill	Q3	21,604	86,085
Ballaghveny Landfill	Q4	4,727	15,761
Ballyngran Landfill	Q4	23,279	9,236
Drehid Landfill	Q4	13,820	100,520
Knockharley Landfill	Q4	18,448	57,284
Totals		**369,060**	**736,672**

2.2.1 EPA Disposal Activities

The EPA BMW figures for Quarter 4 are shown in Table 3 below and it should be noted that the MSW tonnes recorded include both disposal and recovery figures and this indicates variances between MSW and BMW that may be linked to the increased bottom ash delivered to landfills. The % BMW has decreased again in Q4 2025 due to on-going restrictions at Landfills.

Table 3: EPA Breakdown of BMW (Q4 2025)

EPA Breakdown of BMW across landfills

Quarter Selected: Q4 || Year Selected: 2025

Waste License No.	Landfill name	MSW Tonne	BMW Tonne	%BMW in MSW
W0078-03	Ballaghveny Landfill	34,138.01	0.00	0.00%
W0146-04	Knockharley Landfill	146,529.97	26,020.16	17.76%
W0165-02	Ballyngran Landfill	86,690.01	14,055.44	16.21%
W0201-03	Drehid Landfill	190,803.90	20,761.89	10.88%
Totals		**458,161.89**	**60,837.49**	**13.28%**

The total disposal capacity, void space, at landfills for 2025 was projected to be 429,000 tonnes (includes 44,000 contingency activation) . This was a 100% used by the end of 2025 but not all the waste disposal to landfill was classified as rMSW.

4. National Capacity Deficit Q4 2025

In Q4 2025 Ireland processed 417,029 tonnes of rMSW (75Kg/person). In Q4 2025 the updated licenced operational capacity available for the treatment of rMSW in Ireland was 375,224 tonnes (including contingency activation).

The national treatment capacity deficit in Q4 was 41,805 tonnes. and 194,262 tonnes total for 2025.

The national treatment capacity deficit is currently managed through the export of pre-treated waste for recovery. This activity presents two key challenges the first being the management of the material arising from pre-treatment and the second being the securing of export shipping and treatment capacity in an environment where material is neither guaranteed nor consistent. A number of international issues continue to present issues, including cancellation of ships, closure of outlets and competition for current outlets with the UK landfill levy much higher than the Irish Levy. Baled rMSW continues to be exported as a pre-treated/untreated Refuse Derived Fuel (RDF) for thermal treatment generally to efficient WTE plants on the continent of Europe. The trends for the last five years are indicated in Figure 4 below.

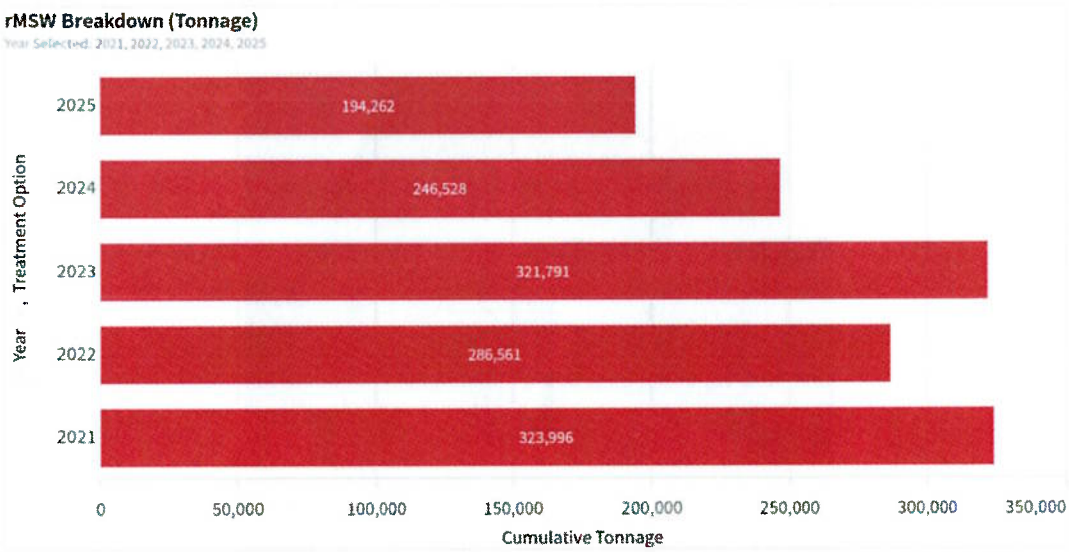

Figure 4: Export Refuse Derived Fuel (RDF): Q1- Q4 2020, 2021, 2022, 2023, 2024 & 2025.

It is important to note that pre-treatment for export generally requires a consistent monthly input and therefore export needs to be balanced across year but in 2025 Q1 export was greater than 70,000 tonnes whereas Q2, Q3 and Q4 were on average 40,000 tonnes per A final outlet for bio-stabilized organic fines produced during processing proved difficult in Q4 with Ballaghveny landfill assisting in providing capacity. The RWMPO request that at an examination of rMSW materials that may be suitable for export that are diverted to other treatment methods be considered during 2026.

The national treatment capacity deficit for 2025 was 194,262 tonnes.

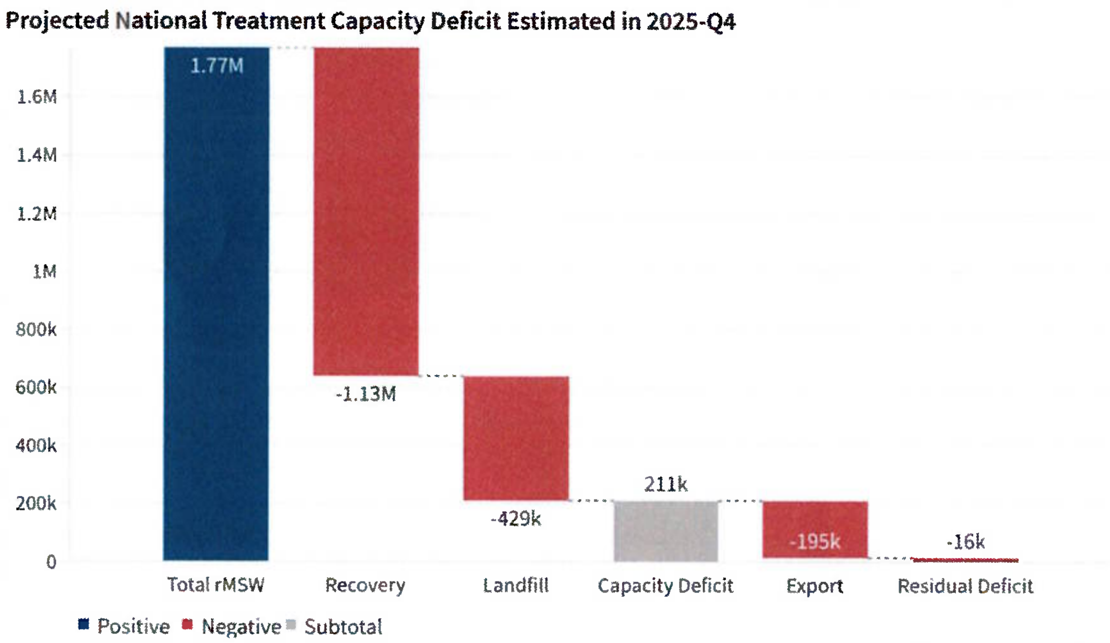

Figure 5: The projected national treatment capacity deficit for 2025.

Only 41,805 tonnes was exported in Q4 and the total for 2025 was 194,262 tonnes has been exported which represents only 77% of the export secured at the start of 2025.

5. Summary of rMSW processed in Q4 2025

The breakdown of residual waste managed in Q4 2025 as indicated in Figure 6 shows that export was 10% in Q4, recovery was 76% and finally disposal was 14% showing only small percentage changes from Q3.

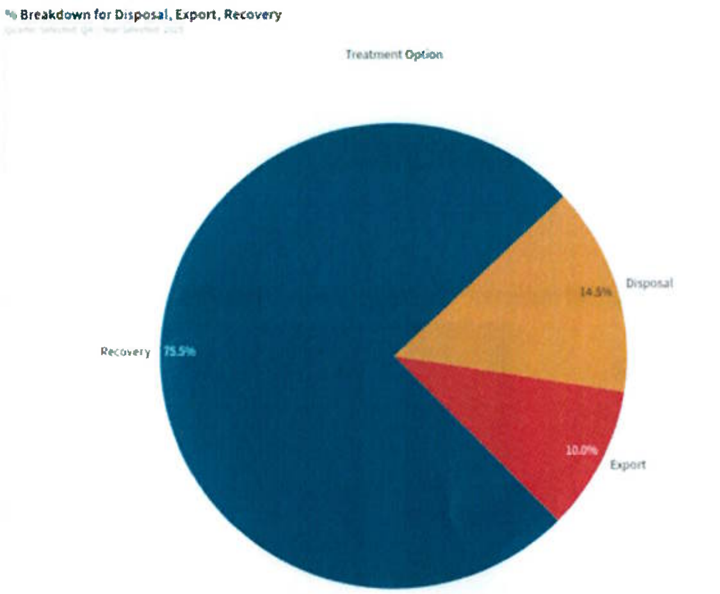

Figure 5: Summary of breadown of residual waste managed in Q4 2025 for recovery, landfill and export.

The overall annual break down for 2025 vs 2024 are shown in Figure 6 and there is a 4% increase in Thermal recovery and a significant decrease in export with disposal remaining stable.

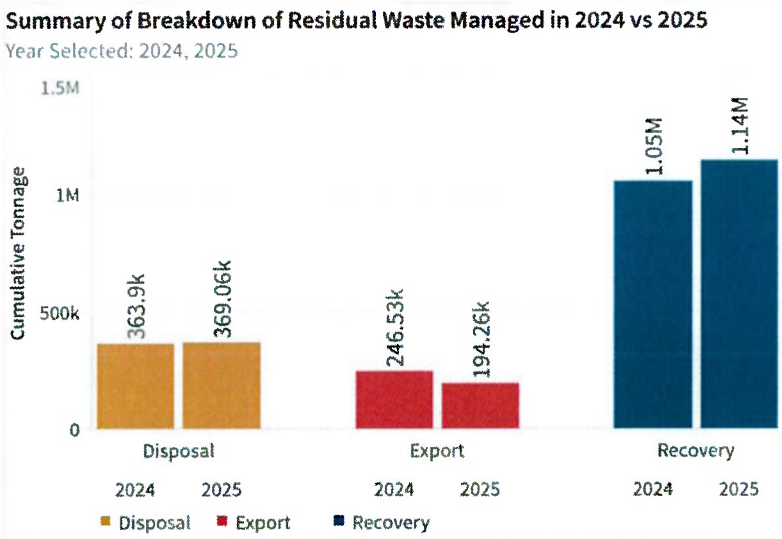

Figure 6: Summary of breakdown of residual waste managed in 2024 vs 2025.

6. Construction & Demolition Waste

According to Irish Construction News (downloaded 22/01/2026), Ireland's construction market is expected to return to robust growth from 2026 onwards, with the total value of project starts (projects under €100m) forecast to rise by 11% in 2026 and a further 10% in 2027, according to the new 'Construction Industry Forecast 2026–2027' from CIS, powered by Hubexo.
The report shows that, despite a muted 1% increase in 2025, the value of project starts in Ireland is projected to expand from €16.6bn in 2024 to more than €20.4bn by 2027. Growth will be driven by renewed residential activity and stepped-up public investment in infrastructure, education and health.

- The capacity to treat inert Construction & Demolition(C&D) waste appears to be satisfied while the capacity to treat non-hazardous non-inert C&D waste is not satisfactory to meet the annual demand and in particular management of C&D Fines.
- Shipments of construction rubble and mixed C&D continue to Northern Ireland and there is small amounts exported to Europe in 2025.
- In total Ireland exported 162, 710 tonnes of C&D waste in 2025 and this is similar to 2024. Some of the major projects are on-going, the details of the codes exported are shown in Table 4.
- Ballaghveny landfill accepted 38,823 tonnes of remediated and non-haz soil from the construction sector in 2025.
- The National by-product decision for soil is having an impact on overall construction & demolition generation for 2025 with considerable amounts of soil and stone moving to major roads projects.

Table 4: C&D Breakdown by EWC 2025

C&D Breakdown by EWC

Year Selected: 2025

EWC	C&D Tonnage
17 05 03*	51,707
17 05 04	37,320
17 09 04	1,492
19 12 12	72,191
Totals	162,710

7. Nationally Important Waste Infrastructure Summary

Table 5: Status of Nationally Important Final Waste Infrastructure Projects (Q4 2025)

Status of Nationally Important Final Waste Infrastructure Projects

Project Name	Location	Tonnage (kt/yr)	Description	Date Lodged	PD	FD	EPA/ACP reference	Comment	EPA/ACP Name
Totals		2,045							
Knockharley Landfill Ltd	Knockharley, Co Meath	440	Landfill	17/12/1015	-	-	-	To extend the life of the current landfill by> 10 years	ACP no ref
Derryclure Energy Centre(Gla...	Tullamore	65	Pyrolysis	6/22/2012	4/16/2014	12/16/2014	W0282-01	Variation/amendment to planning permission to uplift to 200,000 tonnes	Environmental Protection Agency
Drehid Waste Management Facility	Carbury, Kildare	440	Procesing & Landfill	9/19/2014	9/17/2025	-	W0201-05	FD Due end of Feb	Environmental Protection Agency
Dunlavin Lorand Restoration	Kilcullen, Kildare	300	Quarry backfill	1/14/2021	-	-	W0167-04	Scheduled Assessment for 2025	Environmental Protection Agency
Noel Lawler San & Gravel	-	300	Quarry backfill	10/22/2021	-	12/4/2025	W0310-01	Complete	Environmental Protection Agency
Integrated Materials Solutions	Hollywood, Dublin	500	Processing and Landfill	10/1/2022	-	-	-	Planning Permission received with split decision. Currently going through JR process to be heard in late Q3.	-

Table 6: Status of Nationally Important Intermediate Waste Infrastructure Projects (Q4 2025)

Status of Nationally Important Intermediate Waste Infrastructure Projects

Project Name	Location	Tonnage/annum	Description	Date Lodged	PD	FD	EPA/ACP reference	EPA/ACP Name
Country Clean Recycling	Cork	100Kt/yr	Increase in MSW processing		-	-	ACP	N/A
Derryclure Energy Centre(Glanpower)	Tullamore	65000	Pyrolysis	6/22/2012	4/16/2014	12/16/2014	W0282-01	Environmental Protection Agency
Drehid Waste Management Facility	Carbury, Kildare	440000	Procesing & Landfill	9/19/2014	9/17/2025	-	W0201-05	Environmental Protection Agency
Dunlavin Lorand Restoration	Kilcullen, Kildare	300000	Quarry backfill	1/14/2021	-	-	W0167-04	Environmental Protection Agency
Panda Littleton	Tipperary	80kt/yr	Increase in capacity at existing composting facility	8/11/2021	5/28/2025	9/11/2025	EPA 2025 W0249-02	EPA PANDA LITTLETON
Noel Lawler San & Gravel	-	300000	Quarry backfill	10/22/2021	-	12/4/2025	W0310-01	Environmental Protection Agency
Eras Eco	Cork	65Kt (25KT C&I)	Anaerobic Digestion Plan	1/18/2022	Rejected	-	EPA 2025 W0211-03	EPA ERAS ECO
Integrated Materials Solutions	Hollywood, Dublin	500000	Processing and Landfill	10/1/2022	-	-	-	-
Panda Sarsfield Court, Glanmire	Cork	250kt/yr	Merge existing permitted and adjoining existing ...	2/9/2023	-	-	EPA-2025 W0136-04	EPA PANDA Sarsfield Court
Milltown Composting	Tipperary	50Kt to 70Kt	Additional Composting	3/3/2023	6/27/2025	-	EPA-2025 W0270-03	EPA MILLTOWN COMPOSTING
Panda Millennium Park	Fingal	450kt/yr	Increase in capacity at existing MSW processing facility	8/25/2023	-	-	EPA-2025 W0183-03	EPA PANDA Millenium Park
Thornton Ballycoolin	Dublin	-	Recovery of Waste upgraded MRF	2/10/2025	-	-	EPA -2025 P1221-01	EPA THORNTONS BALLYCOOLIN

8. Planning for 2026

increased systematic engagement between all stakeholders is required to manage waste streams effectively in 2026.

Continued engagement in 2026 is important with a particular focus on the use of avaiable void space for rMSW in response to some if the following issues:

- Dublin WTE Plant will have an extended maintenance and development upgrade period and therefore capacity to process in 2026 will be limited to 577,000 tonnes per annum.
- Ballynagran Landfill will come to end of its current authorised planning at the end of February 2026 and its normal intake is 20,000 tonnes per month. So from March onwards rMSW will not be available but they will still be accepting soil and stone, C&D fines and Bio-stabilised fines under the closure plan.
- When Drehid Landfill is issued with a Final Decision on their licence in 2026 this will reduce the annual intake by 100,000 tonnes per annum across disposal and recovery but rMSW limit will remain at 120,000 tonnes per annum.
- Whitestown Landfill is seeking options for disposal of material from the remediation process in 2026 and have pre-booked 29,500 tonnes with Ballaghveny Landfill and up to 50,000 tonnes has been pre-booked at Drehid.
- Starrus Eco-Holding Ltd trading as Panda has secured a new outlet for export which is expected to secure additional export in 2026.

9. Forecasts for 2026

To allow for effective planning, efforts continue to accurately project our waste treatment the year ahead

- Figure 7 shows the Q4 actual vs predicted processing and indicates increased accuracy as the model develops (error of 2.14K tonnage equates to 99.5% accuracy). It also predicts a processing rate of 439,000 tonnes for Q1 2026.
- Figure 8 shows further breakdown by waste treatment type showing 2025 actuals and the prediction for 2026 disposal, recovery and export.
- The operational capacity included for Ballynagran landfill is subject to approval by Wicklow Co, Co.

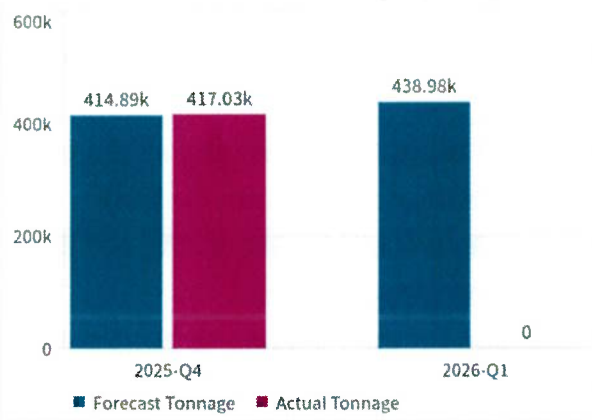

Figure 7: Summary of Q4 2025 (predicted vs. actual) & Q1 2026 (predicted)

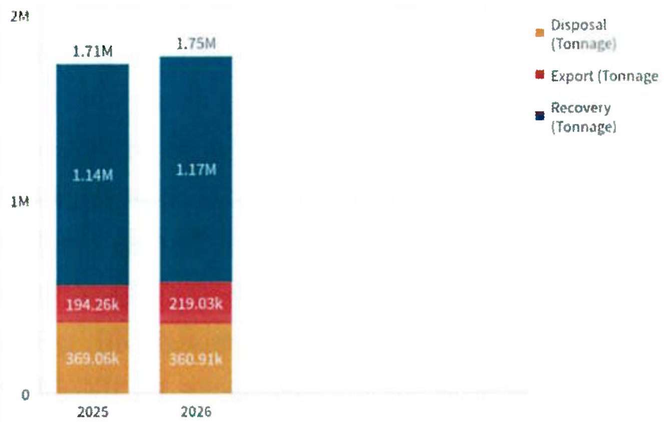

Figure 8: Summary of 2025 waste breakdown (actual) & 2026 (predicted)

In addition Figures 9, 10 & 11 demonstrate the potential deficit for 2026 based on three recycling scenarios as the recycling rate achieved has a direct impact on the generation rate of rMSW.

- Scenario 1: 42% recycling rate.
- Scenario 2: 43% recycling rate.
- Scenario 3: 44% recycling rate.

A 42% recycling rate indicates a capacity deficit after secured export of over 90,000 tonnes some of which may be able to be met by landfill contingency activation. At 43% and 44% the deficit reduces to a more manageable rate.

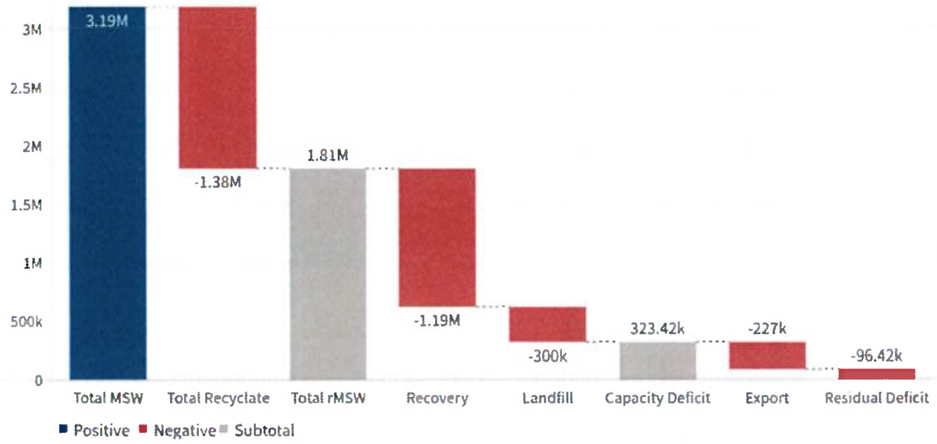

Figure 9: rMSW deficit rate at a 42% recycling rate

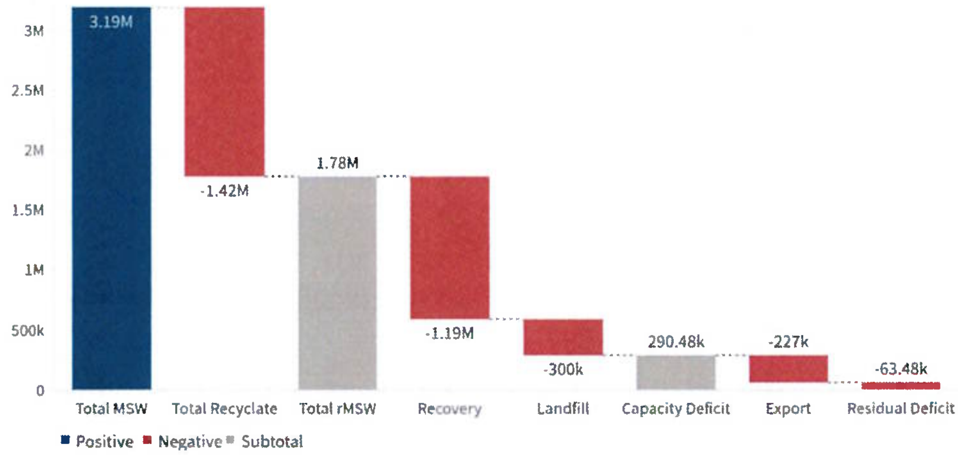

Figure 10: rMSW deficit rate at a 43% recycling rate

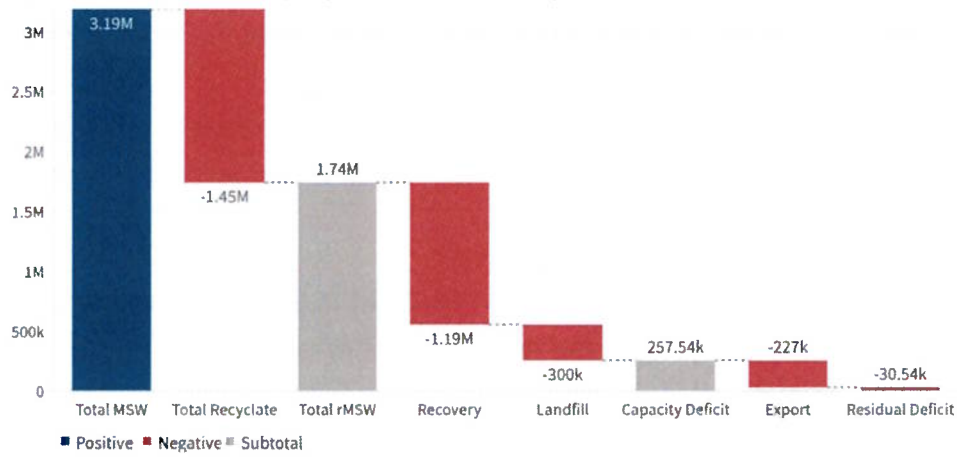

Figure 11: rMSW deficit rate at a 44% recycling rate

As the most likely scenario is 42% recycling rate, it would be preferable for the waste sector too look at all options and to ensure that materials suitable for non-landfill options should be diverted to these options, to ensure longevity of the remaining landfill void space. As the recycling rate increases the deficit reduces significantly so every effort should also be made to ensure waste is segregated appropriately at source or interim facilities.

10. Key Takeaways

Following on from our experience of management of rMSW and other waste streams in 2025 and our learnings from this are our key takeaways as follows:

1. **Thermal Treatment**
   - Direct Thermal Treatment Capacity remains static while the NWMPCE supports the provision of an additional 300kt.
   - Indirect Thermal Treatment Capacity is increasing but requires additional processing of rMSW and is vulnerable to economic conditions.

2. **Waste Disposal**
   - Disposal capacity at landfill is decreasing radically in 2026 (>100kt).
   - C&D Fines are displacing rMSW at landfills.
   - Recovery capacity at landfill is decreasing radically in 2026 with significant implications for construction and demolition wastes (>300kt).

3. **Waste Export**
   - The export option for rMSW is decreasing due to the suitability of material available
   - The export of rMSW is subject to the availability of outlets, shipping, pretreatment arrangements, and outlets for material arising from pretreatment.

4. **Treatment Deficits**
   - The rMSW treatment capacity deficit of 211kt in 2025 was managed through a combination of exports and the activation of operational contingency capacity.
   - The anticipated rMSW treatment capacity deficit for 2026 will be greater than 300kt and will not be easily managed through current arrangements
   - Continued and new interventions at all levels of the management of rMSW are required to mitigate the deficit in 2026 and beyond.

5. **Recycling Rates**
   - rMSW treated remains relatively stable against a backdrop of increased population and economic growth suggesting that recycling rates are above the reported 41%.

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